STATE OF CALIFORNIA GAVIN C. NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

February 28, 2025 CA2025-1265

Jane Whang
Government Affairs
Verizon Communications Inc.
375 West Trimble Road
San Jose, CA 95131

SUBJECT: Communication Infrastructure Provider (CIP) Audit of Verizon's Alameda County Group

Mrs. Whang:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Stephen Lee and Javier Ochoa Reyes of ESRB staff conducted a CIP audit of Verizon's Alameda County Group, comprising of Alameda, San Joaquin, and Stanislaus Counties, from January 6 to January 10, 2025. During the audit, ESRB staff conducted field inspections of Verizon's facilities and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than March 28, 2025, by electronic copy of all corrective actions and preventive measures taken by Verizon to correct the identified violations and prevent the recurrence of such violations.

Please note that ESRB will be posting the audit report and your response to the audit on the CPUC website. If there is any information in your response that you want us to consider as confidential, we request that in addition to your confidential response, you provide us with a public version (a redacted version of your confidential response) to be posted on our website.

If you have any questions concerning this audit, please contact Stephen Lee at (916) 661-2353 or Stephen.Lee@cpuc.ca.gov.

Sincerely,

Rickey Tse, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosure: CPUC CIP Audit Report for Verizon Alameda County Group

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC

Yi “Rocky” Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Stephen Lee, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Javier Ochoa Reyes, Utilities Engineer, ESRB, SED, CPUC
Madonna Ebrahimof, Staff Services Analyst, ESRB, SED, CPUC
Rex Knowles, Director of Government Affairs, Verizon

CPUC AUDIT FINDINGS OF VERIZON ALAMEDA COUNTY GROUP

ALAMEDA, SAN JOAQUIN, AND STANISLAUS COUNTIES

JANUARY 6 – 10, 2025

I. Records Review

During the audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the following records:

- Verizon's Contractor's Overhead Inspection Program and Guidelines
- Verizon's List of Facility Locations
- General Order (GO) 95 Patrol/Detailed Inspections Conducted in the last 5 years (October 2019 – October 2024)
- Most Recent Work Orders Conducted in the last 5 years (October 2019 – October 2024)
- Safety Hazard Notifications Verizon sent to Third Parties in the last 5 years (October 2019 – October 2024)
- Pole loading calculations completed in the last year (October 2023 – October 2024)

II. Records Violations

ESRB observed the following violations during the record review portion of the audit:

1. **GO 95, Rule 18-B(1)(a), Maintenance Programs** states in part:

> *"The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:*
>
> *(i) Level 1 -- An immediate risk of high potential impact to safety or reliability:*
> - *Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.*
>
> *(ii) Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:*
> - *Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.*
>
> *(iii) Level 3 -- Any risk of low potential impact to safety or reliability:*
> - *Take corrective action within 60 months subject to the exception specified below."*

ESRB reviewed Verizon's overhead work orders created between October 2019 to October 2024. During this time, Verizon created 130 work orders. ESRB found that 48 out of 130 (or 37%) of these work orders are late. Late-pending work orders are pending work orders that have not been completed by their assigned due date based on their priority level, and late-closed work orders are work orders that were completed past their assigned due date based on their priority level. Table 1 below breaks down the 48 late overhead work orders by priority level.

Table 1: Late Overhead Facility Work Orders

Priority Level	Late-Pending Work Orders[1]	Late-Complete Work Orders	Total Late Work Orders	Total Work Orders Created	Percentage Late
1	0	9	9	9	100%
1b	0	1	1	1	100%
1c	0	2	2	2	100%
2	5	20	25	39	64%
2a	4	7	11	60	18%
2b	0	0	0	12	0%
3	0	0	0	7	0%
Total	9	39	48	130	37%

The list of all 48 late work orders is included in Appendix A. For the late-pending work orders, Verizon must provide ESRB with both its corrective action plan to complete these work orders and its preventive measures to prevent any work orders from being completed late in the future.

Additionally, based on Verizon's work order list, Verizon utilizes the following Priority Codes:

- Priority 1
- Priority 1b
- Priority 1c
- Priority 2
- Priority 2a
- Priority 2b
- Priority 3

ESRB finds that Verizon's maintenance program does not define these Priorities. In Verizon's maintenance program, it must describe the different criteria for assigning these Priorities, define the maximum corrective action timeframes for these Priorities, and ensure these Priorities comply with the timeframes in GO 95, Rule 18-B1(a).

[1] As of October 8, 2024.

2. **GO 95, Rule 80.1-A(1), Inspection Requirements for Joint-Use Poles in High Fire-Threat District** states in part:

> *"In Tiers 2 and 3 of the High Fire-Threat District, the inspection intervals for (i) Communication Lines located on Joint Use Poles (See Rule 21.8) that contain Supply Circuits (See Rule 20.6-D), and (ii) Communication Lines attached to a pole that is within three spans of a Joint Use Pole with Supply Circuits, shall not exceed the time specified in the following Table.*
>
> | *Inspection* | *Tier 2* | *Tier 3* |
> |---|---|---|
> | *Patrol* | *2 Years* | *1 Year* |
> | *Detailed* | *10 Years* | *5 Years* |
>
> *For the purpose of implementing the patrol and detailed inspection intervals in the above Table, the term "year" is defined as 12 consecutive calendar months starting the first full calendar month after an inspection is performed, plus three full calendar months, not to exceed the end of the calendar year in which the next inspection is due."*

ESRB's review of Verizon's patrol and detailed inspection records found that seven locations in Tier 3 High Fire-Threat Districts (HFTD) were inspected beyond the required inspection cycles. The locations are listed in Table 2 below:

Table 2: Late Inspections in Tier 3 HFTD

Site Name	Last Inspection	Most Recent Inspection
Oakland Hills ODAS- N21	5/1/2020	6/14/2021
Oakland Hills ODAS-N30	6/14/2021	6/17/2024
POLES:POLE::500712050	None	None
POLES:POLE::500711997	None	None
POLES:POLE::500711958	None	None
POLES:POLE::500782396	None	None
POLES:POLE::500782397	None	None

During the audit, ESRB visited the "Oakland Hills ODAS- N21" site and confirmed that it was still in-service and operational. Based on the records provided, Verizon has not inspected this site since June 14, 2021.

The "Oakland Hills ODAS-N30" site is in a Tier 3 HFTD, which requires patrol inspections every year. Based on the records provided, Verizon did not conduct either patrols or detailed inspections for this site in 2022 and 2023.

For the five pole locations, Verizon indicated it attached to these poles in July 2023. These poles are in a Tier 3 HFTD, which require patrol inspections every year. Verizon did not conduct patrol inspections for these poles in 2024[2].

[2] Post-Audit Data Request #1 – Response to Question #4.

3. **GO 95, Rule 80.1.A.(2) – Statewide Inspection Requirements** states in part:

   "Each company shall prepare, follow, and modify as necessary, procedures for conducting patrol or detailed inspections for all of its Communication Lines throughout the State."

   Verizon lacks procedures for conducting patrol or detailed inspections for all of its Communication Lines throughout the State. Verizon's patrol and detailed inspection procedures currently only satisfy inspection requirements in accordance with GO 95, Rule 80.1-A(1) for poles in HFTDs. Verizon is missing procedures for conducting patrol or detailed inspections for non-HFTD areas.

4. **GO 128, Rule 12.2, Maintenance** states:

   "Systems shall be maintained in such condition as to secure safety to workmen and the public in general. Systems and portions thereof constructed, reconstructed, or replaced on or after the effective date of these rules shall be kept in conformity with the requirement of these rules."

   GO 128, Rule 17.2, Inspection of Lines states:

   "Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements of these rules. (See Rule 12.3)."

   Verizon states that it inspects its underground equipment during its course of normal business operations[3]. However, ESRB identified that this practice is not documented anywhere in a procedure. Additionally, when asked to provide records of all underground inspections in the last five years from October 2019 to October 2024, Verizon could not provide any records. Therefore, ESRB finds Verizon in violation of GO 128, Rules 12.2 and 17.2, for lacking procedures and records for inspecting and maintaining its underground facilities.

5. **GO 95, Rule 80.1-A(4), Record Keeping,** states:

   "Each company shall maintain records for at least ten (10) years that provide the following information for each facility subject to this rule: The location of the facility, the date of each inspection of the facility, the results of each inspection, the personnel who performed each inspection, the date and description of each corrective action, and the personnel who performed each correction action. Commission staff shall be permitted to inspect records consistent with Public Utilities Code Section 314 (a)."

[3] Post-Audit Data Request #1 – Response to Question #2

GO 128, Rule 17.7, Location Information states:

> *"Each party operating or owning facilities shall, upon request, provide information as to location of its underground facilities to any other party contemplating underground construction, or work, in the vicinity thereof. Provision of such information by a party will not relieve such other party of his responsibility to locate accurately such underground facilities and to exercise reasonable care during construction or work. If at any time damage or interruption to existing facilities should occur, said other party is enjoined immediately to report such damage to the party owning such damaged or interrupted facilities.*
>
> *A. Records - The responsibility for the maintenance of necessary records to comply with this rule rests with the party owning or operating the facilities. Such records shall be available for inspection at all times by the Commission or the Commission Staff."*

The location information for Verizon's facilities is inaccurate. During the audit, ESRB attempted to inspect several overhead and underground facilities based on the addresses and Global Positioning System (GPS) coordinates provided in Verizon's records. For example, ESRB attempted to visit the handhole and vault facilities "FQN ID ACPT:HH::1220851" and "ACPT:VL::4485985", which Verizon's records indicated as being field-verified as existing facilities on October 23, 2019. However, ESRB could not locate these facilities during the field audit.

Additionally, ESRB found that several of Verizon's patrol and detailed inspection records note "No VzB at Pole," meaning there are no Verizon facilities on the poles. Despite this, Verizon continues to inspect these poles every year or every other year depending on the HFTD requirements. Verizon must verify its facility records to ensure the accuracy of its facility locations and to eliminate inefficiencies with its inspection program.

III. Field Inspection

During the field inspection from January 6 to 10, 2025, ESRB staff inspected Verizon's communication facilities in the locations listed in Table 3.

Table 3: Field Inspection Locations

Location #	Structure Type	Approximate Latitude / Longitude Coordinates	City
1	Radio / Antenna	(37.7346965, -122.0301465)	Castro Valley
2	Radio / Antenna	(37.7382354, -122.0267608)	Castro Valley
3	Pole	(37.7004224, -122.0282941)	Castro Valley
4	Pole	(37.7002115, -122.0279460)	Castro Valley
5	Pole	(37.699969, -122.027402)	Castro Valley
6	Pole	(37.7007097, -122.0287376)	Castro Valley
7	Pole	(37.7007628, -122.0291309)	Castro Valley
8	Vault	(37.6962853, -121.4534212)	Tracy
9	Vault	(37.6960346, -121.4534544)	Tracy
10	Vault	(37.812217, -121.261915)	Manteca
11	Vault	(37.8124145, -121.2619055)	Manteca
12	Pole	(37.9148703, -121.2873891)	Mosswood
13	Pole	(37.9149372, -121.2873938)	Mosswood
14	Pole	(37.9142222, -121.2872044)	Mosswood
15	Pole	(37.9135421, -121.2870126)	Mosswood
16	Handhole	(37.9289227, -121.2818795)	Stockton
17	Handhole	(37.9448397, -121.2902712)	Stockton
18	Radio / Antenna	(37.9997649, -121.3174869)	Stockton
19	Radio / Antenna	(38.0011638, -121.3144483)	Stockton
20	Pole	(38.1457143, -121.3149133)	Lodi
21	Pole	(38.1456503, -121.3154668)	Lodi
22	Pole	(38.1456421, -121.3157773)	Lodi
23	Pole	(38.1457075, -121.3304014)	Lodi
24	Pole	(38.1455733, -121.3295209)	Lodi
25	Radio / Antenna	(37.7157668, -121.9374919)	Dublin
26	Handhole	(37.7157575, -121.9374849)	Dublin
27	Pole	(37.7101158, -121.9416815)	Dublin
28	Pole	(37.7104741, -121.9417955)	Dublin
29	Pole	(37.7102301, -121.9423772)	Dublin
30	Pole	(37.7097845, -121.9416916)	Dublin
31	Pole	(37.6658310, -121.9175131)	Pleasanton

Location #	Structure Type	Approximate Latitude / Longitude Coordinates	City
32	Handhole	(37.6658690, -121.9177388)	Pleasanton
33	Handhole	(37.6651479, -121.9170427)	Pleasanton
34	Pole	(37.6648530, -121.9182963)	Pleasanton
35	Pole	(37.6649626, -121.9180828)	Pleasanton
36	Pole	(37.637936, -121.895261)	Pleasanton
37	Pole	(37.6376382, -121.8949832)	Pleasanton
38	Handhole	(37.4974477, -121.9486663)	Fremont
39	Handhole	(37.4968886, -121.9481956)	Fremont
40	Antenna	(37.5629766, -122.0160457)	Fremont
40.A	Pole	(37.4996312, -121.9823589)	Fremont
41	Pole	(37.6807784, -122.1383790)	San Lorenzo
42	Pole	(37.6804226, -122.1381439)	San Lorenzo
43	Pole	(37.8612758, -122.2090538)	Oakland
44	Pole	(37.8611924, -122.2099752)	Oakland
45	Pole	(37.8625511, -122.2145664)	Oakland
46	Pole	(37.8630355, -122.2154133)	Oakland
47	Pole	(37.8633005, -122.2158475)	Oakland
48	Pole	(37.8634529, -122.2162039)	Oakland
49	Pole	(37.8638550, -122.2171263)	Oakland
50	Pole	(37.8684594, -122.2175950)	Oakland
51	Pole	(37.8684268, -122.2180496)	Oakland
52	Antenna with Surface-Mounted Power Box	(37.8272550, -122.1879499)	Oakland
53	Pole	(37.8115203, -122.1982670)	Oakland
54	Pole	(37.8089016, -122.1940117)	Oakland
55	Pole	(37.8086871, -122.1935738)	Oakland
56	Pole	(37.8084357, -122.1931597)	Oakland
57	Pole	(37.8082895, -122.1927249)	Oakland
58	Antenna	(37.8497911, -122.2872821)	Oakland
59	Antenna	(37.8500021, -122.2862022)	Oakland
60	Antenna Power Supply Box	(37.849974, -122.286351)	Oakland
61	Antenna	(37.8719207, -122.3014392)	Berkeley
62	Pole	(37.8719935, -122.3012527)	Berkeley

Location #	Structure Type	Approximate Latitude / Longitude Coordinates	City
63	Pole	(37.8720081, -122.3010610)	Berkeley
64	Pole	(37.8720745, -122.3007197)	Berkeley
65	Antenna	(37.7734463, -122.1999357)	Oakland
66	Handhole	(37.7734378, -122.1999055)	Oakland
67	Pole	(37.7727321, -122.2002059)	Oakland
67.A	Pole	(37.7720144, -122.1986650)	Oakland
68	Antenna	(37.7942235, -122.2714561)	Oakland
68.A	Pole	(37.7944630, -122.2713532)	Oakland
69	Pole	(37.7957792, -122.2707121)	Oakland
70	Handhole	(37.7945557, -122.2698015)	Oakland
71	Antenna	(37.8035019, -122.3002523)	Oakland
72	Pole	(37.8031478, -122.2979409)	Oakland
73	Pole	(37.8030272, -122.2974417)	Oakland
74	Pole	(37.8029130, -122.2968992)	Oakland
75	Pole	(37.8028272, -122.2965086)	Oakland
76	Antenna	(37.8026778, -122.2964506)	Oakland
77	Handhole	(37.8026778, -122.2964506)	Oakland

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. **GO 95, Rule 31.1, Design, Construction and Maintenance** states in part:

> *"Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.*
>
> *For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.*
>
> *A supply or communications company is in compliance with this rule if it designs, constructs, and maintains a facility in accordance with the particulars specified in General Order 95, except that if an intended use or known local conditions require a higher standard than the particulars specified in General Order 95 to enable the furnishing of safe, proper, and adequate service, the company shall follow the higher standard."*

ESRB's findings related to the above rule are listed in Table 4:

Table 4: GO 95, Rule 31.1 Findings

Location #	Findings
25	The antenna power panel and disconnect box are not locked.
28	Verizon needs to transfer its facilities to the new pole.
54	Verizon needs to transfer its facilities to the new pole.
55	Verizon needs to transfer its facilities to the new pole.
56	Verizon needs to transfer its facilities to the new pole.
57	Verizon needs to transfer its facilities to the new pole.
61	The antenna disconnect box is not locked.

2. **GO 95, Rule 34, Foreign Attachments** states in part:

> *"Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.*
>
> *Nothing herein contained shall be construed as requiring utilities to grant permission for such use of their overhead facilities; or permitting any use of joint poles or facilities for such permanent or temporary construction without the consent of all parties having any ownership whatever in the poles or structures to which attachments may be made; or granting authority for the use of any poles, structures or facilities without the owner's or owners' consent."*

ESRB's findings related to the above rule are listed in Table 5:

Table 2: GO 95, Rule 34 Findings

Location #	Findings
20	There are foreign attachments (advertisement signs) on Verizon's pole.
21	There are foreign attachments (advertisement signs) on Verizon's pole.

3. **GO 95, Rule 38, Table 2, Case 16.C** requires the following:

> *The radial separation of conductors on the same crossarm, pole or structure between conductors, taps or lead wires of different circuits requires at least three inches of separation from communication conductors.*

ESRB's findings related to the above rule are listed in Table 6:

Table 6: GO 95, Rule 38, Table 2, Case 16.C Findings

Location #	Findings
29	Verizon's fiber is unraveling from the snowshoe and is contacting the other communication company's facilities.
41	Verizon's fiber cable is tied into another communication company's messenger cable at midspan. Additionally, there is an excess spool of fiber that is contacting the other communication company's facilities at the pole.

4. **GO 95, Rule 84.4-D(4)(a), Clearances, From Nonclimbable Street Lighting or Traffic Signal Poles or Standards (including mastarms, brackets and lighting fixtures),** states:

> *"When passing street lighting, traffic signal poles or standards (including mastarms, brackets and lighting fixtures) a clearance of 12 inches, as specified in Table 1, Case10, Column B, may be reduced when suitable insulation for the highest voltage of open wire involved and mechanical protection from abrasion is provided where necessary. Such mechanical protection shall extend not less than 15 inches in each direction from centerline of pole, standard, attaching mastarm or fixture, whether passing above, below or alongside. There shall be no interference with light distribution from lighting fixtures and workers shall not be hampered or endangered in the performance of their duties."*

ESRB's finding related to the above rule is listed in Table 7:

Table 7: GO 95, Rule 84.4-D(4)(a) Finding

Location #	Finding
62	Verizon's fiber span is contacting a streetlight.

5. **GO 95, Rule 84.6-B Ground Wires** states:

> *"Ground wires, other than lightning protection wires not attached to equipment or ground wires on grounded structures, shall be covered by metal pipe or suitable covering of wood or metal, or of plastic conduit material as specified in Rule 22.8–A, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet. Such covering may be omitted providing the ground wire in this 7 foot section has a mechanical strength at least equal to the strength of No. 6 AWG medium–hard–drawn copper.*
>
> *Portions of ground wires which are on the surface of wood poles and within 6 feet vertically of unprotected supply conductors supported on the same pole, shall be covered with a suitable protective covering (see Rule 22.8)."*

ESRB's finding related to the above rule is listed in Table 8:

Table 8: GO 95, Rule 84.6-B Finding

Location #	Finding
12	The ground moulding is separating from the surface of the pole and is exposing the ground wire.

6. **GO 95, Rule 84.6-D Vertical Runs** states in part:

"Runs of bridled conductors, attached to surface of pole, need not be covered provided such runs are below the guard arm and in the same quadrant as the longitudinal cable, or where such runs are below and on the same side of pole with a cable arm and are not in the climbing space, or are connected to service drops which are placed in accordance with the provisions of Rule 84.8–B2b. Where bridled runs are not required to be covered by these rules, they shall be supported by bridle hooks or rings spaced at intervals of not more than 24 inches."

ESRB's finding related to the above rule is listed in Table 9:

Table 9: GO 95, Rule 84.6-D Finding

Location #	Finding
34	Verizon's riser cable is not secured at intervals of not more than 24 inches.

7. **GO 95, Rule 84.7-A(5)(a), Allowable Climbing Space Obstructions** states:

"Vertical conductors, when in a suitable protective covering attached directly to the surface of the pole, terminal boxes or similar equipment which do not extend more than 5 inches from the surface of the pole, and guys, will not be held to obstruct the climbing space provided not more than two guys (provided they are separated at the pole by a vertical distance of not more than 18 inches) and one other of the above named obstructions are installed in any 4-foot vertical section of climbing space."

ESRB's finding related to the above rule is listed in Table 10:

Table 10: GO 95, Rule 84.7-A(5)(a) Finding

Location #	Finding
35	Verizon, Comcast, and AT&T each have their own anchor guy in the pole's climbing space. GO 95, Rule 84.7-A(5)(a) only allows not more than two guys in the climbing space within a four-foot section. The communication companies must identify a solution to resolve the climbing space issues.

8. **GO 95, Rule 86.2, Guys, Use** states in part:

"Guys shall be attached to structures as nearly as practicable at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44."

ESRB's finding related to the above rule is listed are Table 11:

Table 11: GO 95, Rule 86.2 Finding

Location #	Finding
67	The anchor guy is missing. There is a guy hook (Ram's Head) installed on the pole, but no corresponding anchor guy.

9. GO 95, Rule 86.6-B(2), Sectionalized Because of Exposure or Proximity to Supply Conductors, Guys in Proximity states in part:

"Every overhead or anchor guy, any portion of which is in proximity to a wood pole and supply conductors of 0 - 35,500 volts (see Appendix G, Figures 45, 48 and 49) shall be sectionalized by means of insulators as specified in Rule 86.7–A2 or Rule 86.7–B, and no portion in proximity to such supply conductors shall be grounded."

ESRB's findings related to the above rule are listed in Table 12:

Table 12: GO 95, Rule 86.6-B(2) Findings

Location #	Findings
22	The anchor guy is in proximity to supply conductors but is missing a sectionalizing insulator.
27	The anchor guy is in proximity to supply conductors but is missing a sectionalizing insulator.
29	The anchor guy is in proximity to supply conductors but is missing a sectionalizing insulator.

10. GO 95, Rule 86.9, Guy Marker (Guy Guard) states:

"A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker."

ESRB's findings related to the above rule are listed in Table 13:

Table 13: GO 95, Rule 86.9 Findings

Location #	Findings
22	The marker on the anchor guy is damaged.
51	The anchor guy marker is installed in the incorrect spot of the guy. During the audit, it was pushed all the way up to the anchor guy's sectionalizing insulator.

11. GO 95, Rule 87.7-D(1), Risers, Covered from Ground Level to 8 Feet Above the Ground states:

"Risers shall be protected from the ground level to a level not less than 8 feet above the ground by:

a) Securely or effectively grounded iron or steel pipe (or other covering at least of equal strength). When metallic sheathed cable rising from underground non-metallic conduit is protected by metallic pipe or moulding, such pipe or moulding shall be effectively grounded as specified in Rule 21.4-A, or

b) Non-metallic conduit or rigid U-shaped moulding. Such conduit or moulding shall be of material as specified in Rule 22.8"

ESRB's findings related to the above rule are listed in Table 14:

Table 14: GO 95, Rule 87.7-D(1) Findings

Location #	Findings
12	The riser cover is missing at the bottom of the pole and exposes the fiber cable.
15	The riser cover is missing at the bottom of the pole and exposes the fiber cable.
67	Verizon's riser cover is detaching from the pole at the topmost section of the riser.

12. GO 95, Rule 92.4-C(1), Grounding, Grounding Conductors states in part:

"The grounding conductors of the communication messenger system shall conform to each of the following requirements […]:

(c) The grounding conductor from the ground rod (ground electrode) to the messenger shall be continuous, unless suitable electrical compression connections are used."

ESRB's finding related to the above rule is listed in Table 15:

Table 15: GO 95, Rule 92.4-C(1) Finding

Location #	Finding
31	The grounding conductor is disconnected from the ground rod at the base of the pole.

13. GO 95, Rule 92.4-C(2), Grounding, Ground Rods (Grounding Electrodes) states in part:

"Ground rods on the communication messenger system(s) shall conform to each of the following requirements […]

(c) Ground rods shall be driven into the ground so that one end of the ground rod is at a minimum depth of 8 feet below the surface of the ground. The top end of the ground rod shall not be less than 1 foot below the surface of the ground."

ESRB's findings related to the above rule are listed in Table 16:

Table 16: GO 95, Rule 92.4-C(2) Findings

Location #	Findings
51	The ground rod is exposed above ground.
53	The ground rod is exposed above ground.

14. GO 95, Rule 94.4, Antennas, Clearances, states in part:

"A. Antennas and support elements below supply lines shall maintain a vertical clearance of 6 feet from Supply Conductors operating at 0 – 50kV. (See Figure 94-1)

B. Antennas and support elements below communication lines shall maintain a 2 ft. vertical separation from communication conductors and equipment. (See Figure 94-1)

C. Antennas, associated equipment (e.g. terminations, enclosures) and support elements installed above supply lines and/or communication lines of different ownership attached to the same structure shall maintain the vertical clearances specified in Rule 38, Table 2, Case 21, Columns A - H.

D. Antennas, associated equipment (e.g. terminations, enclosures) and support elements, installed above supply lines and/or communication lines of different ownership, shall maintain the radial clearances from unattached supply and communication lines specified in Rule 38, Table 2, Case 3."

ESRB's findings related to the above rule are listed in Table 17

Table 17: GO 95, Rule 94.4 Findings

Location #	Findings
58	Verizon's antennas are less than two feet from communication lines.
59	Verizon's antennas are less than two feet from communication lines.
68	Verizon's antennas are less than two feet from communication lines.
71	Verizon's antennas are less than two feet from the communication span guy.

15. GO 128, Rule 17.1, Design, Construction and Maintenance states in part:

"Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service."

ESRB's findings related to the above rule are listed in Table 18:

Table 18: GO 128, Rule 17.1 Findings

Location #	Findings
8	The surface-mounted grounding terminal is missing a cover.
60	The surface-mounted power supply's disconnect box is not locked. Additionally, the grounding conduit is broken.

16. GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures states:

"*Manholes, handholes, subsurface and self-contained surface-mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity."*

ESRB's finding related to the above rule is listed in Table 19:

Table 19: GO 128, Rule 17.8 Finding

Location #	Finding
52	The surface-mounted power supply box is missing ownership identification.

17. GO 128, Rule 42.7, Covers states:

"*Manholes and handholes, while not being worked in shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them, and arrangement shall be such that a tool or appliance shall be required for their opening and cover removal (Also See Rule 17.8 and Appendix B, Figure 9)."*

ESRB's finding related to the above rule is listed in Table 20:

Table 20: GO 128, Rule 42.7 Finding

Location #	Finding
9	The cover does not fit over the handhole.

V. Observations

1. GO 95, Rule 18-A, Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

"(3) If a company, while performing inspections of its facilities, discovers a Safety Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such Safety Hazard(s) no later than ten (10) business days after the discovery."

"(4) To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days after discovery. The notified pole owner(s) shall be responsible for promptly (normally not to exceed five business days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO 95."

ESRB observed the following third-party findings during the audit. Verizon must issue third-party notifications to the respective utilities for these findings. ESRB's findings related to the above rule are listed in Table 21:

Table 21: GO 95, Rule 18-A Findings

Location #	Findings
1	Crown Castle's anchor guy is loose.
2	Crown Castle needs to transfer its facilities to the new pole. Additionally, their anchor guy is pulling out of the ground.
4	PG&E's neutral conductor on the service drop is damaged. ESRB immediately notified PG&E about the issue during the audit. On January 8, 2025, PG&E dispatched a troubleshooter and made repairs to the neutral conductor.
12	AT&T's telephone span is contacting Verizon's fiber span. AT&T's span is also contacting the anchor guy.
14	AT&T's telephone span is tied to Verizon's messenger span. There is also an abandoned AT&T service drop hanging at the midspan.
15	AT&T's telephone cable is contacting Verizon's fiber cable at the pole attachment.
18	There appears to be residual staining or an oil leak or on the low side center phase tap on PG&E's transformer located one span to the west of Location 18 (the pole at 37.999730, -121.317638).

Location #	Findings
22	AT&T's anchor guy is in proximity to supply conductors but is missing a sectionalizing insulator.
23	AT&T's riser cable is not secured at intervals of not more than 24 inches.
24	AT&T's telephone span is less than 18 ft across the throughfare. Additionally, AT&T's riser cable is not secured at intervals of not more than 24 inches.
34	Comcast needs to complete its pole transfer. There is still a cut section of the old pole suspended by its cable span.
36	Comcast's lashing wire is loose, which is causing the cables to have low vertical clearances above the ground.
40.A	PG&E ground moulding is not secured to the pole.
42	AT&T's fiber span is contacting PG&E's disconnect switch handle. Additionally, AT&T's anchor guy is in proximity to supply conductors but is missing a sectionalizing insulator.
43	Zayo and AT&T need to transfer their facilities to the new pole.
47	AT&T's visibility strip is damaged.
49	AT&T's pole is leaning and causing vertical clearance issues for the telephone span that crosses the throughfare.
50	There is a foreign attachment (security camera) installed on the pole. AT&T's lashing wire is loose.
51	There is a foreign attachment (security camera) installed on the pole. PG&E's anchor guy is contacting AT&T's anchor guy above its sectionalizing insulator. Crown Castle's anchor guy is missing a sectionalizing insulator.
53	AT&T's lashing wire is loose.
55	The communication companies need to transfer their facilities to the new pole. AT&T's service drops are currently attached to the old pole and contacting the new pole.
56	The communication companies need to transfer their facilities to the new pole.

Location #	Findings
57	The communication companies need to transfer their facilities to the new pole. PG&E's anchor guy is loose and pulling out of the ground.
58	PG&E's service drop riser is not secured to the pole.
59	AT&T's anchor guy is in proximity to supply conductors but is missing a sectionalizing insulator.
63	There is strain from vegetation on AT&T's and Comcast's facilities.
67	AT&T's riser cover is detached from the surface of the pole and is exposing the riser cable.
67.A	PG&E's pole top is rotten and is causing the crossarm to tilt significantly.
68.A	AT&T's service drop is abandoned. The communication companies are not attached to this pole but are contacting the pole's surface. GO 95, Table 1, Case 9.B requires a 15-inch clearance for communication conductors from the center line of the pole, whether attached or unattached.
71	Extenet needs to transfer its facilities to the new pole.
72	AT&T's lashing wire is damaged. There is strain from vegetation on Comcast's facilities.
73	There is an abandoned AT&T service drop hanging at the midspan. Comcast's facilities are tied to Verizon's messenger span. Comcast has an abandoned spool of coaxial cable attached near the base of the pole.

Appendix A – Late Work Orders from October 2019 to October 2024

Work Order Location (Verizon "PSLC")	Priority Level	Fire Tier	Creation Date	Due Date	Completion Date	Late Type
360	1	Tier 3	08/25/21	09/01/21	12/09/21	Late Complete
361	2	Tier 3	08/25/21	02/24/22	08/26/22	Late Complete
362	2a	Tier 3	08/25/21	08/25/22	09/10/22	Late Complete
367	2a	Tier 3	08/25/21	08/25/22	09/10/22	Late Complete
368	2	Tier 3	08/25/21	02/24/22	09/10/22	Late Complete
368	2a	Tier 3	08/25/21	08/25/22	09/10/22	Late Complete
372	2	Tier 3	08/25/21	02/24/22	Pending	Late Open
372	2a	Tier 3	08/25/21	08/25/22	Pending	Late Open
373	2a	Tier 3	08/25/21	08/25/22	09/10/22	Late Complete
2203	2	Tier 3	08/25/21	02/24/22	09/10/22	Late Complete
2203	2a	Tier 3	08/25/21	08/25/22	09/10/22	Late Complete
2205	2a	Tier 3	08/25/21	08/25/22	09/10/22	Late Complete
1340	1	Tier 2	11/15/21	11/22/21	09/07/22	Late Complete
1341	1	Tier 2	11/15/21	11/22/21	09/02/22	Late Complete
1342	1	Tier 2	11/15/21	11/22/21	09/02/22	Late Complete
1215	2	Tier 2	11/22/21	05/24/22	10/27/22	Late Complete
1298	1	Tier 2	11/22/21	11/29/21	10/27/22	Late Complete
1298	2	Tier 2	11/22/21	05/24/22	10/27/22	Late Complete
1302	2	Tier 2	11/22/21	05/24/22	10/27/22	Late Complete
2184	2	Tier 2	11/22/21	05/24/22	10/27/22	Late Complete
1227	2	Tier 2	11/30/21	06/01/22	08/25/22	Late Complete
1240	2	Tier 2	11/30/21	06/01/22	08/25/22	Late Complete
1245	2	Tier 2	11/30/21	06/01/22	08/25/22	Late Complete
1253	2	Tier 2	11/30/21	06/01/22	08/25/22	Late Complete
1253	2	Tier 2	11/30/21	06/01/22	08/25/22	Late Complete
1255	2	Tier 2	11/30/21	06/01/22	08/25/22	Late Complete
1255	2	Tier 2	11/30/21	06/01/22	08/25/22	Late Complete
1256	2	Tier 2	11/30/21	06/01/22	08/25/22	Late Complete
1260	2	Tier 2	11/30/21	06/01/22	08/25/22	Late Complete
1264	1c	Tier 2	11/30/21	12/30/21	08/25/22	Late Complete
1270	2	Tier 2	11/30/21	06/01/22	08/25/22	Late Complete
1230	2	Tier 2	12/01/21	06/02/22	08/25/22	Late Complete
1231	1c	Tier 2	12/01/21	12/31/21	08/25/22	Late Complete
1232	2	Tier 2	12/01/21	06/02/22	Pending	Late Open
1232	2a	Tier 2	12/01/21	12/01/22	Pending	Late Open

Work Order Location (Verizon "PSLC")	Priority Level	Fire Tier	Creation Date	Due Date	Completion Date	Late Type
1510	2	Tier 2	12/01/21	06/02/22	08/25/22	Late Complete
1508	2	Tier 2	12/02/21	06/03/22	08/25/22	Late Complete
1511	2a	Tier 2	12/02/21	12/02/22	Pending	Late Open
1511	2	Tier 2	12/02/21	06/03/22	Pending	Late Open
270328	2a	Non-HFTD	11/4/2022	11/4/2023	11/4/2024	Late Complete
413010	2	Tier 3	11/7/2022	5/9/2023	Pending	Late Open
1243	2	Tier 2	06/26/23	12/26/23	Pending	Late Open
1243	2a	Tier 2	06/26/23	06/25/24	Pending	Late Open
359	1	Tier 3	06/20/24	06/27/24	11/01/24	Late Complete
368	1	Tier 3	06/20/24	06/27/24	10/31/24	Late Complete
371	1	Tier 3	06/20/24	06/27/24	10/31/24	Late Complete
3106	1	Tier 2	06/20/24	06/27/24	10/28/24	Late Complete
3117	1b	Tier 2	06/20/24	07/04/24	10/28/24	Late Complete